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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA

GIL CROSTHWAITE, et al. as Trustees of the  
OPERATING ENGINEERS HEALTH AND  
WELFARE TRUST FUND, et al.,

Plaintiffs,

v.

SANCHEZ GRADING, a California  
Corporation, and LEO SANCHEZ, an  
Individual,

Defendants.

Case No.: C09-01386 JL

**REQUEST TO CONTINUE CASE  
MANAGEMENT CONFERENCE  
and [PROPOSED] ORDER THEREON**

Date: July 8, 2009

Time: 10:30 a.m.

Ctrm: F, 15th Floor

Judge: The Honorable James Larson

Plaintiffs herein respectfully request a Continuance of the Case Management Conference currently on calendar for July 8, 2009.

1. A Complaint was filed in this matter on March 30, 2009, and an Amended Complaint was filed in this matter on June 2, 2009.

2. Service on Defendants was effectuated on June 4, 2009, and a Proof of Service of Summons was filed with the Court on June 22, 2009.

3. A Request for Entry of Default was filed with the Court on June 29, 2009.

4. Plaintiffs are in the process of preparing a Motion for Default Judgment, which should be filed in the next several weeks. Accordingly, Plaintiffs respectfully request that the Case Management Conference, currently scheduled for July 8, 2009, be continued to either

1 coincide with the date set for the Motion; continued for 60 days to allow disposition of the Motion  
2 or vacated entirely.

3 5. There are no issues that need to be addressed at the currently scheduled  
4 conference.

5 I declare under penalty of perjury that I am the attorney for the Plaintiffs in the above  
6 entitled action, and that the foregoing is true of my own knowledge.

7 Executed this 30th day of June, 2009, at San Francisco, California.


8 SALTZMAN & JOHNSON  
9 LAW CORPORATION

10  
11 By: \_\_\_\_\_/S/  
12 Michele R. Stafford  
13 Attorneys for Plaintiffs

14 IT IS SO ORDERED.

15 The currently set Case Management Conference is hereby continued to  
16 September 30, 2009 at 10:30 a.m., and all previously set deadlines and  
17 dates related to this case are vacated, to be reset at that Conference.

18 Date: 7-1-09

19   
20 THE HONORABLE JAMES LARSON  
21 UNITED STATES DISTRICT COURT JUDGE  
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PROOF OF SERVICE

I, the undersigned, declare:

I am a citizen of the United States and am employed in the County of San Francisco, State of California. I am over the age of eighteen and not a party to this action. My business address is 44 Montgomery Street, Suite 2110, San Francisco, California 94104.

On June 30, 2009, I served the following document(s):

**REQUEST TO CONTINUE CASE MANAGEMENT CONFERENCE  
and [PROPOSED] ORDER THEREON**

on the interested parties in said action by First Class U.S. Mail, by placing a true and exact copy of each document in a sealed envelope with postage thereon fully prepaid, in a United States Post Office box in San Francisco, California, addressed as follows:

**Sanchez Grading  
5698 E. Copper Ave.  
Clovis, California 93619-9547**

**Leo Sanchez  
5698 E. Copper Ave.  
Clovis, California 93619-9547**

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed on this 30th day of June, 2009, at San Francisco, California.

\_\_\_\_\_/S/\_\_\_\_\_  
Vanessa de Fabrega